

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

Case # 2:15CR20563

HON. DAVID M. LAWSON

TAMAR KAREB – ANDRE WATKINS

Defendant.

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**DEFENDANT'S SENTENCING MEMORANDUM**

**1. Nature and Circumstances of The Offense. 18 U.S.C. § 3553 (a) (1)**

Throughout the investigation and prosecution of this case, Mr. Watkins was completely forth coming and compliant. During his initial interview with arresting officers he acknowledged possession of the firearm, albeit possession was only momentary, See PSR page 5. At all times he admitted involvement in the offense.

As a point of clarification it MUST be noted it there have been no assertions, Mr. Watkins played a role in the matters that were the basis for the search warrant for the premises where Mr. Watkins was arrested.

**II. Background and Characteristics of Tamar Kareb Andre Watkins – 18 § 3553 (a) (1)**

Defendant Watkins acknowledges the accuracy of the personal family history data set forth in the PSR.

**III. Deterring the Criminal Conduct of Others – 18 U.S.C. § (a) (2) (B)**

As indicated in paragraph 13 of the PSR Mr. Watkins served 15 years in prison. His offense is attributable to involvement at an early age with a street gang in Chicago. He successfully completed parole and has had no major contacts with the criminal justice system. Mr. Watkins lack of contact with the criminal justice system since getting off parole coupled with the restrictions on the mobility over the last 15 months has been a sufficient deterrent to future criminal conduct by Mr. Watkins.

**IV. Types of Sentences of Sentences Available and The Sentencing Guidelines Range – 18 U. S. C. § 18 – 3553 (a) (4)**

Defendant concurs with the guidelines range put forward by the probation department in the Pre- Sentence Report.

**V. Avoidance of Unwanted Sentencing Disparity – 18 U. S.C. § (a) (6)**

There are no co-defendants; therefore sentence disparity is not an issue.

**DOWNWARD VARIANCE**

The experience of living in this world teaches us that human beings, and human lives, are usually multifaceted and that a person cannot be fairly judged on the basis of only one aspect of his life. Here, Mr. Watkins has had one major brush with the law. A conviction that arises from involvement with a gang he joined after relocating from Detroit to Chicago as a teenager. Mr. Watkins reports that trying to survive in his new surroundings led to his participation in activities that he will forever regret. The lack of contact with the criminal justice system since his release from parole suggests that there

is a substantial reason for leniency; they are both more than accounted for by the guidelines themselves. When the entire picture of Mr. Watkins's life and circumstances is put into perspective, and the nature of her offense, conduct and criminal history fairly analyzed, there is more than ample reasons to impose a sentence far less than what is called for in the guideline calculations; both as a matter of downward departure and of variance.

### **CONCLUSION**

In light of all the factors discussed in the Sentence Memorandum and based on fair consideration of all the factors set forth in 18 U.S.C. § 3553 (a) Mr. Watkins prays this Honorable Court will impose a sentence to a half way house followed by a period of supervised release.

Respectfully submitted,

/s/Claude M. Chapman \_\_\_\_\_

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Dated: April 17, 2016

**CERTIFICATION OF SERVICE**

I hereby certify that on **April 18, 2016**I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send electronic notification of such filing to all attorneys of record.

/s/ Claude M. Chapman  
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